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VIA ECF

The Honorable Kimba M. Wood
United States District Court for the Southern District of New York
500 Pearl Street
New York, New York 10007

Re: de Lacour v. Colgate-Palmolive Co., Case No. 16-cv-8364

Dear Judge Wood:

Pursuant to the Court's February 14, 2022 Order, Dkt. No. 179, the Parties in the above-referenced matter jointly write to update the Court on activity accomplished in this case during the prior seven days.

Production: On February 18, 2022, Defendants served their production labeled COLGATETOMS_011 on Plaintiffs, which included 3,172 documents with 21,143 pages. Defendants believe that these documents substantially complete their productions.

Custodial Search Terms: Per the Parties' agreement on February 16, 2022, Defendants are testing additional search terms across the null set of documents that did not hit on prior search terms. Defendants will meet and confer with Plaintiffs once their review of any resulting hits is complete.

Exchange of Status Reports: Because Defendants have now substantially completed their productions, Plaintiffs will be responsible for drafting and filing the ordered joint status reports, following the same drafting schedule outlined in the Parties' February 18, 2022 report.



Respectfully submitted,

/s/ Hannah Y. Chanoine

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